

Application No.: 10/713,840
Group Art Unit: 2655

Attorney Docket No: 1999-0679A-CON

REMARKS

Reconsideration and allowance in view of the foregoing amendments and the following remarks are respectfully requested. By this amendment, claims 1-23 are pending, claims 1-3, 6-8, 10, 12-15, 17 and 18 having been amended, and claims 21-23 having been newly added.

Rejection of Claims 1-20 under 35 U.S.C. 112

On page 2 of the non-final Office Action of July 11, 2005, the Examiner rejected claims 1-20 under 35 U.S.C. 112, first paragraph, as allegedly failing to comply with the written description requirement. In particular, the Examiner alleged that clustering into morphemes based on similar characteristics, as claimed, is not described. Applicants amended claims 1-3, 6-8, 10, 12-15, 17 and 18. Applicants submit that only the amendments to independent claims 1, 13 and 17 obviate the rejection. Claims 3 and 15 were amended to conform to the changes made to claims 1 and 13, respectively, and to recite a previously unclaimed feature. Claim 7 was amended to depend from claim 5, which introduces the limitation, "training speech". Claim 12 was amended to further distinguish the claim from the claims of U.S. Patent Application No. 6,681,206. All other claim amendments were made only to improve presentation.

Applicants amended claim 1 to recite clustering salient sub-morphemes into morphemes based on using a combination of distortion measures. Independent claims 13 and 17 were amended similarly. Applicants submit that page 8, lines 20-22 of the originally-filed specification provides support for this feature. The remaining claims depend from one of claims 1, 13 or 17.

Applicants submit that claims 1-20 comply with the written description requirement and respectfully request that the rejection of claims 1-20 be withdrawn.

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Rejection of Claims 1-8 Due to Same Invention Double Patenting

On page 2 of the Office Action, the Examiner rejected claims 1-20 as allegedly claiming the same subject matter as claims 13-25 of U.S. Patent No. 6,681,206. Applicants submit that amended claims 1, 13 and 17 obviate the rejection.

Applicants amended claim 1 to recite clustering into morphemes based on using a combination of distortion measures. Independent claims 13 and 17 were amended similarly. Applicants submit that page 8, lines 20-22 of the originally-filed specification provides support for this feature.

Claims 13-25 of U.S. Patent No. 6,681,206 are directed to a method of generating morphemes that includes, among other things, clustering salient sub-morphemes based on semantic and syntactic similarities. Amended claims 1, 13 and 17 recite, among other things, clustering salient sub-morphemes based on using a combination of distortion measures. Applicants submit that clustering salient sub-morphemes based on semantic and syntactic similarities and clustering salient sub-morphemes based on using a combination of distortion measures have different scopes. Therefore, claims 1, 13 and 17 and their respective dependent claims are not drawn to the same subject matter as claims 13-25 of U.S. Patent No. 6,681,206.

For at least the reasons discussed above, Applicants respectfully request that the rejection of claims 1-20 be withdrawn.

Further, Applicants submit that claim 4 differs from the subject matter of claims 13-25 of U.S. Patent No. 6,681,206 for reasons of its own. For example, claim 4 recites, among other things, that the generated morphemes are used by a speech recognition and understanding system. Claim 16 of U.S. Patent No. 6,681,206 recites that a morpheme database is used by a speech recognition and understanding system. Applicants submit that the features of claim 4 are broader than that of claim 16 of U.S. Patent No. 6,681,206 at least because claim 4 does not require the use of a morpheme database. Further none of the claims